

United States District Court  
District of Oregon  
Eugene Division

John Fredrick Swank, II

Plaintiff,

v.

Springfield Police Department,  
and City of Springfield, and  
Ronald Bates,  
Defendants.

Civil Case No. 6:19-cv-02021-MK  
Complaint for Violation  
of Civil Rights, Police  
Brutality Tort, Assault  
With a Deadly Weapon  
Tort, Bad Faith Policing  
Tort, and Negligence Tort

Yes, Jury Trial Demanded.

I. Parties

Plaintiff John Fredrick Swank II

1728 Ferry Street, Unit 2

Eugene, OR 97401

Defendant 1 Springfield Police Department  
230 4th Street  
Springfield, OR 97477

Defendant 2 City of Springfield  
225 5th Street

Springfield, OR 97477

Continued

Defendant 3 Ronald Bates

230 4th street

Springfield, OR 97477

## II. Basis of Jurisdiction

Plaintiff is bringing suit under 42 U.S.C. 1983, and all relevant statutory and common law standards establishing liability for police brutality, assault with a deadly weapon causing bodily injury, bad faith policing, negligence, and intentional infliction of emotional distress, for police officer Ronald Bates putting Plaintiff into custody, and then twice causing a police dog to attack him, ordering the dog to bite him, causing Plaintiff serious bodily injuries, and possible permanent disability, etc.

## III. Statement of Claims

On August 27, 2019, Defendants arrived at Plaintiff's friend's home on Riverview and called out that they had a warrant out for him. Plaintiff went out the back and hid. Defendants found, grabbed, and detained Plaintiff. Then and only then Defendants sicked a police dog on Plaintiff, twice, the first time ordering the dog to bite Plaintiff, causing plaintiff serious injuries, emotional distress, losses, damages, and injuries. Following the attack Defendants said, "oops, forgot to turn my camera on."

Medical treatment for Plaintiff is ongoing, having needed stitches, and sustained nerve damage, possibly permanently disabling, and scarring him significantly.

Continued

IV. Relief

Plaintiff asks court that he be granted \$2,000,000.00 in damages, and all other remedies deemed just and proper.

I declare under penalty of perjury that the foregoing is true and correct.

Signed,

Dated, November 18, 2019 John S.

John Fredrick Swank II

Notary Lola A. Sierra  
Lola A. Sierra  
Commission Expires 4/27/2020

